

DENNIS J. HERRERA, State Bar #139669
City Attorney
ELIZABETH SALVESON, State Bar #83788
Chief Labor Attorney
JONATHAN C. ROLNICK, State Bar #151814
Deputy City Attorney
Fox Plaza
1390 Market Street, Floor #5
San Francisco, California 94102-5408
Telephone: (415) 554-3815
Facsimile: (415) 554-4248

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO
and WILLIAM FRAZIER

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SUSIE ABRAM,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, DEPARTMENT OF
PUBLIC HEALTH; WILLIAM FRAZIER,
DIRECTOR OF THERAPEUTIC
ACTIVITIES, LAGUNA HONDA
HOSPITAL

Defendant.

Case No. C07-3006 PJH

E-filing case

**STIPULATION AND [PROPOSED]
ORDER CONTINUING EXPERT
DISCOVERY CUTOFF**

Trial Date: December 8, 2008

IT IS HEREBY STIPULATED by and between the parties:

This case is set for trial on December 8, 2008. Under the Court's scheduling order expert discovery closes on Friday, September 5, 2008. Plaintiff Susie Abram has identified one expert witness, Dr. Jeanne Riviere. The City has timely sought to depose Dr. Riviere.

The Court heard the City's motion for summary judgment on July 23, 2008. The parties are awaiting the Court's ruling on that motion. Depending on the outcome of that ruling, the deposition of Dr. Riviere may be unnecessary. While the parties await that ruling, and in the interest of saving

1 further time and expense, the parties agree to extend the expert discovery cutoff from September 5,
2 2008 to October 10, 2008, and to request that the Court enter an order to that effect. The parties do
3 not anticipate that this will have any adverse impact on their ability to prepare for the November 13,
4 2008 pretrial conference or the December 8, 2008 trial date.

5 Dated: September 2, 2008

6 DENNIS J. HERRERA
City Attorney
7 ELIZABETH SALVESON
Chief Labor Attorney
8 JONATHAN C. ROLNICK
Deputy City Attorney
9

10 By: s:/Jonathan C. Rolnick
JONATHAN C. ROLNICK
11

12 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO
13 and WILLIAM FRAZIER

14 Dated: September 2, 2008

15 LAW OFFICES OF CURTIS G. OLER
16

17 By: s:/Curtis G. Oler
CURTIS G. OLER
18

19 Attorneys for Plaintiff
SUSIE ABRAM
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

IT IS HEREBY ORDERED THAT the September 5, 2008 discovery cutoff be continued to October 10, 2008.

DATED: _____

HON. PHYLLIS J. HAMILTON
United States District Court Judge